

Serial No.: 09/241,188  
Docket No.: 10655.7117

### **REMARKS**

Applicants reply to the Office Action dated December 28, 2005, within a two month extended period for reply. Claims 36-48 were pending in the application and the Examiner rejects claims 36-48. Support for the amendments may be found in the originally-filed specification, claims, and figures. No new matter has been introduced by these amendments. Applicants assert that the application is in condition for allowance and reconsideration of the pending claims is requested.

### **Rejection under 35 U.S.C. § 112**

The Examiner rejects claims 42 and 43 under 35 U.S.C. § 112, first paragraph, as failing to comply with the enablement requirement. Specifically, the Examiner asserts that, "Claim 42 refers to software access controls in firewalls, but is not further explained. Claim 43 refers to router implemented access restrictions that are not otherwise mentioned" (page 4, last paragraph). Applicants respectfully traverse these rejections.

Applicants assert that the claims as written are complete and that no further explanation is required in order to convey to one of ordinary skill in the art that the firewall may control access to the database through either software implemented controls or through a hardware implemented control, such as router implemented access restrictions. Support may be found in the originally filed disclosure in, for example, page 15 paragraph 3 through page 16 paragraph 1 which discloses:

"A firewall is any mechanism that prevents access across a logical boundary. Although the firewalls are preferably implemented as software access controls, alternate embodiments include user ID/password schemes or hardware controls such as router-implemented access restrictions. Alternatively, multiple firewall techniques such as physical access controls and software controls are combined. Firewalls generally preserve business unit autonomy and data integrity by isolating data according to, for example, the key field" (emphasis added).

The Examiner rejects claims 44-48 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.

Regarding claims 44-47, the Examiner asserts that the claims reference a "second plurality of secondary classes of objects . . . but fail to state whether these are part of the second subsection or the third subsection mentioned in claim 36" (page 5, paragraph 2). Applicants have amended claim 36 to more specifically disclose that the third subsection contains, "a third plurality of secondary classes." As such, claims 44-47 now more clearly refer back to the "second plurality of secondary classes of objects" of the second subsection.

Serial No.: 09/241,188  
Docket No.: 10655.7117

Regarding claim 48, the Examiner asserts that the claim, "refers to 'said third plurality of secondary classes of objects' but there is no mention of a third plurality" (page 6, paragraph 3). Applicants have amended claim 36 to more clearly disclose that the third subsection contains, "a third plurality of secondary classes." As such, the antecedent basis issue for this claim element of claim 48 is corrected.

The Examiner asserts that claim 48 is indefinite. Specifically, the Examiner states that, "[t]here is no mention of intermediary objects in the disclosure" (page 5, paragraph 4). Applicants respectfully traverse this rejection. The original disclosure contains references to key class objects, secondary class objects and intermediate class objects. The intermediate class objects provide an additional layer between the key class objects and the secondary class objects. Support may be found in the originally filed disclosure at, for example, page 16, paragraph 2 and page 17, paragraph 2 which disclose:

"Alternatively, intermediate classes (corresponding to geographic region, business sub-units, or any other suitable form of differentiator) exist between the highest level key class 188 and the 'products' class 186" (emphasis added).

"Objects retained within repository 144 suitably perform various functions or retain particular formats of data, as described below. These objects are suitably utilized by objects of key class 188 and secondary class 186, as well as any intermediating classes" (emphasis added).

However, to expedite prosecution, Applicants have amended the claims for clarity. To be more consistent with the terminology used in the specification, "first high-level class" now reads, "high-level key class"; "second high-level class" now reads, "high-level secondary class"; and "third high-level class" now reads, "high-level intermediate class."

**Rejection under 35 U.S.C. § 103(a)**

The Examiner rejects claims 36-48 under 35 U.S.C. § 103(a) as being unpatentable over Schein et al., U.S. Patent No. 6,226,623 ("Schein"). Applicants respectfully traverse these rejections.

The Examiner appears to have drawn a parallel between the various hardware and software components of Schein (e.g., system, database, and firewall) and the unique object structure disclosed within the claims of the instant application. Specifically, the Examiner notes that Schein discloses a system, a database, and a firewall. The Examiner asserts that, "Schein does not use applicant's various divisions and labels for its various components. However, the labels given to the various actors and modules are not functionally related to the substrate of the article of manufacture. The labels themselves carry little or no weight" (page 6, paragraph 2).

Serial No.: 09/241,188  
Docket No.: 10655.7117

Those of ordinary skill would immediately appreciate that "classes", as used in the Applicants' claims, refer to the categorization or grouping of objects sharing similar behaviors and structures and that "objects" are instances of classes. When a program makes a call to a class, an instance of that class is created, which is defined as a "class object". When the object has completed its specific task, it is deleted from memory. As such, classes and objects are very specialized units of structured program code, and cannot be compared to any of the components as disclosed by Schein. The differentiating features of objects and classes go well beyond labeling. For example, labeling a database as an object would not change the function of the database.

The Examiner alternatively rejects claims 36-43 under 35 U.S.C. § 103(a) as being unpatentable over Schein in view of Owens et al., U.S. Patent No. 6,047,267 ("Owens"). Applicants respectfully traverse these rejections.

In general, Schein discloses a system and method for integrating data relating to customer transaction accounts based upon a customer's relationship with a financial institution. The Schein system logically links data from various accounts belonging to a customer to provide a more holistic view of the customer's relationship with the financial institution. Schein discloses a complex messaging system for managing data residing in geographically diverse locations, while ensuring that homogeneous data remains integrated. Schein further discloses "workflow data rules" that define how messages are to be routed.

The Examiner has directed Applicants to various portions of the Schein disclosure as providing teachings to the various elements of Applicants' claims. However, the cited teachings are directed toward the management of large amounts of data through a commonly known practice of logical data modeling. It is clear that the Examiner has equated the practice of data modeling to the use of objects and classes. A data model is a logical data structure developed during database design, which also describes the structural properties that define all of the entities represented in a database and all the relationships that exist among them. In other words, data modeling occurs during the design process, resulting in a blueprint for the creation of database tables and links. The resulting physical database cannot, by itself, function to provide data without programmatic interaction.

The Examiner asserts that, "classes and objects are another way of modeling & data in persistent storage" (page 11, paragraph 2). While Applicants agree that classes and objects may be used in the modeling process, this is quite different from the use of classes and models disclosed in the instant application. Various organizations provide software tools to assist in the data modeling

Serial No.: 09/241,188  
Docket No.: 10655.7117

process. One such example is Rational Rose® by IBM Corporation. Rational Rose is a standalone software tool that enables database developers to visually model the structure of a database and define table relationships. The data model can be later used to create the structure of the database as defined by the model. Objects and classes that are part of the Rational Rose tool are used to create the data model; however, the objects and classes do not become a part of the physical database that is constructed according to the data model. As such, Schein does not disclose or suggest at least an "object repository including a plurality of reusable objects from which said high-level key class of objects, said high-level intermediate class of objects, and said high-level secondary classes of objects are derived," as recited by independent claim 36,

The Examiner correctly notes that Schein, "does not use the words first, second and third high-level class" (page 11, paragraph 3). However, the Examiner asserts that, "Owens discloses the use of relational databases in an object-oriented design in a multi-product on-line and Internet environment" (page 11, paragraph 3). Applicants respectfully disagree.

Owens discloses an object structure which allows a user to define new payment resources without requiring modifications to a relational database. An Owens object server automatically generates appropriate tables and columns for the relational database. When a new payment source is added to an account, a secondary object representing the payment source is created which inherits the properties of the container object.

Owens incorporates objects to represent a virtual view of a database structure, in that tables with complex linking structures can be represented within objects. As such, only the object needs to know the structure of the database. If a table within a database is modified, only objects referencing that table need to be modified. Therefore, functions and procedures in a program do not need to be modified, because they rely on the object to collect the required data. However, as pointed out by Owens, such object-oriented database architectures can slow up searches. Therefore, Owens uses the objects to create the table structure and data in transient memory; thus, the data can be searched in a more efficient manner. The objects, as disclosed by Owens, may represent any number of configuration of linked tables. However, there is no disclosure of a one-to-one relationship between objects and specific products. As such, neither Schein, Owens, nor any combination thereof, disclose or suggest an object repository, wherein at least "each of said second plurality of secondary classes of objects is associated with one of said plurality of stored value products," as recited by independent claim 36.

Serial No.: 09/241,188  
Docket No.: 10655.7117


Claims 37-48 depend from independent claim 36. Dependent claims 37-47 are differentiated from the cited references for at least the same reasons as set forth above, as well as their own respective features.

In view of the above remarks and amendments, Applicants respectfully submit that all pending claims properly set forth that which Applicants regard as their invention and are allowable over the cited references. Accordingly, Applicants respectfully request allowance of the pending claims. The Examiner is invited to telephone the undersigned at the Examiner's convenience, if that would help further prosecution of the subject Application. Applicants authorize and respectfully request that any fees due be charged to Deposit Account No. 19-2814, including any required extension fees. Attached is a Petition for Extension of Time Under 37 CFR 1.136(a).

Respectfully submitted,

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